

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

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:
UNITED STATES OF AMERICA, : Criminal Action No.
:
versus : 1:19-cr-356
:
KHASHIE SENAM ZILEVU, : July 12, 2021
:
Defendant. : **MATTHEW BROWN TESTIMONY**
-----x

The above-entitled Jury Trial - **Excerpt** was heard
before the Honorable Rossie D. Alston, Jr., United States
District Judge.

A P P E A R A N C E S

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On behalf of the Government:

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1 (Excerpt trial proceedings - Matthew Brown's testimony.)

2 MR. FIORILLO: The government calls Matthew Brown.

3 THE COURT: Matthew Brown.

4 (Government's witness, Matthew Brown, sworn.)

5 (Witness seated.)

6 THE COURT: Sir, you don't have to answer this
7 question, but I must do it for purposes of the CDC.

8 Are you fully vaccinated, sir?

9 THE WITNESS: I am.

10 THE COURT: Thank you, sir.

11 MR. FIORILLO: Your Honor, at this time, the
12 government would like to move the exhibits that have been
13 admitted into evidence into evidence.

14 THE COURT: Okay. The stipulations, Counsel, that I
15 see run from No. 1 all the way up through No. 193, and also 20
16 through 21As and Bs. They come in by way of stipulation --

17 MR. FIORILLO: Your Honor, if I may. Sorry to
18 interrupt. We would like to admit the ones particular to
19 Mr. Brown at this time. There are some that we will not be
20 admitting. We are planning to go witness by witness and admit
21 the ones --

22 THE COURT: The ones that show on my list, and
23 please correct me if I'm wrong, are 10, 11, 11A, 11B, 11C,
24 11D, 11E, 11F.

25 MR. FIORILLO: We missed a couple here, Your Honor.

1 For Mr. Brown, it might be helpful if I read them.

2 Would you like me to do so?

3 THE COURT: Very good.

4 MR. FIORILLO: For Mr. Brown, it would be
5 Government's Exhibit 10, 11, 11A, 11B, 11E, 11F, 11G, 11H, 20,
6 21, 21A, 22 --

7 THE COURT: Hold on.

8 MR. FIORILLO: Sorry.

9 THE COURT: 20, 20A.

10 MR. FIORILLO: No 20A, Your Honor. Just 20, 21,
11 21A, 22, 24, 24A, 52, 80, 81, 82, 83, 84, 85, 90, and 121A.

12 THE COURT: Without objection.

13 MR. BROWN: Without objection, Your Honor.

14 MR. FIORILLO: Thank you, Your Honor.

15 Also, Your Honor, may I have permission to read
16 stipulation No. 1 onto the record.

17 THE COURT: Without objection.

18 MR. BROWN: No objection, Your Honor. Sorry.

19 MR. FIORILLO: Stipulation No. 1 between the
20 parties: At all times relevant to the indictment, the
21 defendant Kwashie Senam Zilevu resided at 14520 General
22 Washington Drive, Woodbridge, Virginia 22913.

23 THE COURT: Ladies and gentlemen, what has been read
24 into the record is a stipulation between counsel. A
25 stipulation is to be treated just as if someone had come onto

1 the stand and testified to that extent, and you should receive
2 it in that matter.

3 MR. FIORILLO: May I proceed, Your Honor?

4 THE COURT: You may.

5 DIRECT EXAMINATION

6 BY MR. FIORILLO:

7 Q. Good afternoon, sir. Could you please say and spell your
8 name for the record.

9 A. Matthew Brown. M-a-t-t-h-e-w, B-r-o-w-n.

10 Q. Mr. Brown, what city and state do you currently live in?

11 A. Clive, Iowa.

12 THE COURT: Hold on just a second. We might have a
13 technical issue.

14 MR. FIORILLO: Sure.

15 THE COURT: You might need to move a little closer
16 to the mic, sir.

17 THE WITNESS: Clive, Iowa.

18 MR. FIORILLO: Thank you.

19 BY MR. FIORILLO:

20 Q. How long have you lived in Clive, Iowa?

21 A. A little over 20 years.

22 Q. Sir, what do you do for a living?

23 A. I'm in the automotive business.

24 Q. And what type of work do you do in the automotive
25 business?

1 A. I'm a car dealer, a Buick GMC car dealer.

2 Q. What's the name of your dealership?

3 A. Bob Brown GMC.

4 (Court reporter clarification.)

5 THE WITNESS: Bob Brown.

6 BY MR. FIORILLO:

7 Q. Have you -- other than your car dealership, have you ever
8 owned any other businesses?

9 THE COURT: Just a moment.

10 Joel and Marlan, can you take the Plexiglass down.

11 THE WITNESS: Is that better?

12 THE COURT: It's going to be.

13 THE WITNESS: Okay.

14 THE COURT: Let's do a test.

15 Say your name again, sir.

16 THE WITNESS: Matthew Brown.

17 THE COURT: Is that better? Thank you. Very good.

18 Thank you, Joel. Thank you, Marlan.

19 BY MR. FIORILLO:

20 Q. Sir, you were testifying about the auto dealership you
21 own in Clive, Iowa.

22 Could you state the name of your auto dealership.

23 A. Sure. It's Bob Brown, Buick GMC.

24 Q. And have you ever owned any other businesses?

25 A. No, I have not.

1 Q. Do you currently have any business partners?

2 A. Yes, I do.

3 Q. Who is that?

4 A. Ron Brown, my father.

5 Q. Other than your father, have you had any other business
6 partners?

7 A. No, I do not.

8 Q. Have you ever had a business partner named Kwaku Blay?

9 A. No.

10 Q. Have you previously -- thank you.

11 I'm going to direct your attention, Mr. Brown, to a
12 company called American Express.

13 Are you familiar with that company?

14 A. Yes, I am.

15 Q. Have you ever had an account with American Express?

16 A. Yes, I do.

17 Q. And what kind of account is that?

18 A. A personal credit card.

19 Q. Did you apply for an American Express credit card in
20 2016?

21 A. No, I did not.

22 Q. What, if any, contact did you have with American Express
23 in 2017?

24 A. I contacted American Express simply to change my payment
25 due date in January of 2017. And at that time, they asked me

1 which account. I explained to them I only had one account.

2 They explained to me that I had two open accounts, a
3 personal and a business one. And I asked them about the
4 business one. They said there was a balance on it, and I
5 asked to be transferred to the fraud department.

6 Q. How much was that balance?

7 A. They told me it was around \$49,000.

8 Q. And when you were transferred, who did you speak with?

9 A. A Peter Boresky.

10 Q. What did you speak with Mr. Boresky about?

11 A. Just simply explain to him that I did open the account.
12 I requested to see a copy of the application and was denied
13 that. And he stated that it would be turned over and go
14 through the process of the fraud department.

15 Q. It would be turned over where?

16 A. To the fraud department.

17 Q. And after you spoke with Mr. Boresky from American
18 Express, what happened next?

19 A. Some time went by and I got a couple of notifications
20 from American Express and was contacted -- I believe the first
21 contact was by Inspector Palmer.

22 (Court reporter clarification.)

23 THE WITNESS: I was first contacted by Inspector
24 Palmer.

25 BY MR. FIORILLO:

1 Q. Right now, Mr. Brown, I would like to direct your
2 attention to what's been admitted as Government Exhibit 10.

3 With the assistance of the court security officer, I
4 would like you to take a look at it in the binder. Hardcopy,
5 please.

6 A. Which exhibit?

7 Q. Exhibit 10, sir.

8 A. Okay.

9 MR. FIORILLO: Your Honor, the jurors' exhibit
10 that's being displayed to the jurors is partially redacted to
11 protect Mr. Brown's PII.

12 THE COURT: Ladies and gentlemen of the jury, you're
13 seeing an item that has been stipulated to. It's been
14 partially redacted. We have a responsibility as agents of
15 this information to make sure that certain information that is
16 private in nature not be divulged in a public way.

17 When you are able to consider this evidence, you
18 will receive the unredacted versions of this piece of
19 evidence.

20 MR. FIORILLO: Thank you, Your Honor.

21 BY MR. FIORILLO:

22 Q. Mr. Brown, are you on Exhibit 10 now?

23 A. I am.

24 Q. I'd like to direct your attention to the top left-hand
25 corner of the document, about six lines down on the first

1 page.

2 Do you see the name, "Matthew B. Brown" there?

3 A. I do.

4 Q. Is that your name?

5 A. Yes, it is.

6 Q. Under your name a couple more lines, do you recognize the
7 nine digit number there?

8 A. It's my Social Security number.

9 Q. Underneath that, do you see the address in Clive, Iowa?

10 A. Yes.

11 Q. Are you familiar with that address?

12 A. Yes. That's the first home that we've ever purchased.

13 Q. How long did you reside at that address?

14 A. Roughly ten years.

15 Q. Below that, do you see two telephone numbers listed?

16 A. I do.

17 Q. Starting with the one on the left, next to the letter B,
18 are you familiar with that number?

19 A. No, I'm not.

20 Q. How about the number on the right next to the H, are you
21 familiar with that number?

22 A. Yes.

23 Q. How are you familiar with it?

24 A. That number was the phone number, the home phone number
25 associated with this address.

1 Q. If you could now turn to page 2.

2 Do you see on the right-hand side of the page, about
3 nine lines down, where it says "app RCVDDTE"?

4 A. Page 2? Yes, I do.

5 Q. What is the date listed there?

6 A. January 25th of 2016.

7 Q. Mr. Brown, you identified a few different means of
8 identification of yours that are present on this document, but
9 you've also testified there today that you did not apply for
10 an American Express credit card in 2016.

11 Did you ever give anyone your Social Security to
12 have them apply for an American Express card for you?

13 A. No, I did not.

14 Q. Did you ever provide anyone with authorization to open a
15 credit card in your name?

16 A. No.

17 Q. Let's now turn to the third exhibit of this page, please.

18 Let's now take a look about nine lines down on the
19 page on the left-hand side.

20 Do you see where it says "Customer demographics,
21 enter, function, add, change, delete"?

22 A. I do.

23 Q. Directly below that, do you see where it says "M, slash,
24 comp Belview Auto"?

25 A. Yes.

1 Q. Have you ever owned a business by that name?

2 A. No.

3 Q. Have you ever been involved in any way with a business by
4 that name?

5 A. No.

6 Q. Below that, do you see the address listed there?

7 A. Yes.

8 Q. Could you read it.

9 A. 14520 General Washington in Woodbridge, Virginia.

10 Q. Have you ever lived there?

11 A. No.

12 Q. Have you ever owned a business located there?

13 A. No.

14 Q. Have you ever been to that address?

15 A. No.

16 Q. Have you ever even been to Woodbridge, Virginia?

17 A. No.

18 Q. Now, beneath the Woodbridge address there are two columns
19 of information: "Verification data" on the left-hand side and
20 "verified" on the right-hand side.

21 Do you see that?

22 A. I do.

23 Q. Three lines down, where it says "NAT ID," is that your
24 Social Security number again?

25 A. Yes, it is.

1 Q. Is it also present in the verified area?

2 A. Yes.

3 Q. Turn now to the very last page of this exhibit, if you
4 would, please.

5 A. Okay.

6 Q. I'm going to direct you to the bottom of the page.

7 Do you see the e-mail address listed there?

8 A. I do.

9 Q. Could you read it.

10 A. B-l-a-y at dumabase.com.

11 Q. Is that your e-mail address?

12 A. No.

13 Q. Have you ever used that e-mail address before?

14 A. No.

15 Q. Do you know who it belongs to?

16 A. No.

17 Q. Have you ever -- you mentioned your father is your
18 business partner, I believe you testified earlier.

19 Have you ever had a business partner named Kwaku
20 Blay?

21 A. No.

22 Q. I'd like now to direct you to Government Exhibit 11.

23 A. Okay.

24 Q. I think, for the most part, you would be able to look at
25 the screen for this exhibit, sir.

1 In the top left-hand corner, do you see a name
2 associated with this account?

3 A. I do.

4 Q. Whose name?

5 A. Matthew Brown.

6 Q. Is that your name?

7 A. Yes.

8 Q. Looking to the far right, what are the last four digits
9 of the account number associated with this American Express
10 account?

11 A. 2003.

12 Q. Looking down at the bottom left of the first page we are
13 on.

14 According to the document, where were the statements
15 for this account being mailed?

16 A. 14520 General Washington, Woodbridge, Virginia.

17 Q. And you testified earlier that you've never been to
18 Woodbridge, Virginia?

19 A. Correct.

20 Q. Have you ever received any of these documents for this
21 account at your home address in Iowa?

22 A. No.

23 Q. Scroll down to page 3 of this exhibit, please.

24 Do you see the first transaction listed on May 10th
25 of 2016, showing a \$7,400 charge?

1 A. I do.

2 Q. What company is being paid?

3 A. PayPal, MacroTele.

4 Q. Did you ever make a payment to MacroTele?

5 A. No.

6 Q. Did you ever authorize someone else to make a payment to
7 MacroTele using a credit card in your name?

8 A. No.

9 Q. Before your involvement in this proceeding, were you at
10 all familiar with an entity called MacroTele?

11 A. No.

12 Q. I'd like now to direct your attention to the first two
13 purchases that posted on May 14th of 2016.

14 Looking at the first line of the transaction detail,
15 for that first transaction, what was purchased?

16 A. An airline ticket through Delta Airlines.

17 Q. For how much?

18 A. \$781.20.

19 Q. Where did this flight leave from?

20 A. Baltimore Washington.

21 Q. And where did this flight go to?

22 A. It looks like Minneapolis, and then to Sacramento.

23 Q. And did you ever purchase tickets to Sacramento using
24 this account that was opened in your name?

25 A. No.

1 Q. And on the second line of this transaction detail, what
2 name is listed there?

3 A. Kwashie Zilevu.

4 Q. Have you ever purchased a plane ticket to Sacramento for
5 someone named Kwashie Zilevu?

6 A. No.

7 Q. Have you ever authorized anyone to use a credit card open
8 in your name to purchase a plane ticket to Sacramento for
9 someone named Kwashie Zilevu?

10 A. No.

11 Q. Before you were involved in this case, have you ever even
12 known anyone named Kwashie Zilevu?

13 A. No.

14 Q. And there's a second transaction on that date. If you
15 could direct your attention to that.

16 Do you see a name listed that's associated with that
17 transaction?

18 A. I do.

19 Q. What is it?

20 A. Nefise Y-e-n-i-l-m-e-z.

21 Q. Have you ever purchased a plane ticket for someone by
22 that name?

23 A. No.

24 Q. Have you ever authorized anyone to do so?

25 A. No.

1 Q. Before you were involved in this case, did you even know
2 anyone by that name?

3 A. No.

4 Q. Now, look at the first page of this exhibit again.

5 Do you see in the top right-hand corner of the page
6 under "account summary," where it says "new charges"?

7 A. I do.

8 Q. How much is listed there regarding new charges for this
9 account in your name?

10 A. \$9,541.60.

11 Q. Mr. Brown, did you make any of those charges?

12 A. No.

13 Q. Could you now turn to Government's Exhibit 11A.

14 Is this another monthly statement for the American
15 Express credit card account ending in 2003, that was opened in
16 your name?

17 A. It is.

18 Q. Can we go to page 4, please.

19 Do you see the first transaction on May 31st in the
20 amount of \$1,339.16?

21 A. I do.

22 Q. Mr. Brown, have you ever been to Accra, the capital of
23 Ghana, a country in West Africa?

24 A. No.

25 Q. Have you ever purchased a plane ticket for anyone to

1 travel from Washington Dulles Airport to Accra, Ghana?

2 A. No.

3 Q. Now, if you could look closely at the transaction detail
4 again. And on the second-to-last line, what name is listed
5 there?

6 A. Kwashie Zilevu.

7 Q. Have you ever purchased a plane ticket to Ghana for
8 someone named Kwashie Zilevu?

9 A. No.

10 Q. Have you ever authorized anyone to do so?

11 A. No.

12 Q. And you testified earlier that you don't know anyone
13 named Kwashie Zilevu?

14 A. Correct.

15 Q. Let's now turn to Government Exhibit 11B.

16 A. D or B?

17 Q. B, sir.

18 A. Okay.

19 Q. If you could look at the first page.

20 Is this another monthly statement from the American
21 Express credit card ending 2003, that was opened in your name?

22 A. It is.

23 Q. Could you turn to page 3, please.

24 A. Okay.

25 Q. Do you see a \$300 payment reflected at the top of this

1 page?

2 A. I do.

3 Q. Did you make that payment?

4 A. No.

5 Q. Do you know who did?

6 A. No.

7 Q. If you could, now, let's take a look at Government
8 Exhibit 121A. And I believe your monitor, sir, so you don't
9 have to keep flipping through the book.

10 A. It's kind of hard to read.

11 Q. It's hard to read?

12 A. Yeah. I don't mind the book.

13 121A?

14 Q. Yes, please.

15 A. I'm there.

16 Q. On the first page, what is the name in the top left
17 corner?

18 A. Kwashie Zilevu.

19 Q. And if you could, on the left-hand side of the page, to
20 the left, with a text block first begins.

21 What kind of account is this?

22 A. It appears to be a savings account.

23 Q. And in the top right corner, what is -- of the page --
24 what is the date range listed?

25 A. The 1st of July, 2016, through the 31st of July, 2016.

1 Q. Could you turn to page 2, sir.

2 A. Okay.

3 Q. Specifically transaction listed on July 18th.

4 How much is that payment for?

5 A. \$300.

6 Q. What company was paid?

7 A. American Express.

8 Q. Is that the same payment amount reflected on the account
9 opened in your name that was just discussed?

10 A. It is.

11 Q. Could we now take a look at Government's Exhibit 11F,
12 please.

13 And just to verify, again, could you please take a
14 look at the account number on the right-hand side of the page
15 and tell us whether this is another account statement for the
16 account you've identified as being opened in your name.

17 A. Yes. It's account ending in 2003.

18 Q. I would like to take a look at page 4, please.

19 A. Okay.

20 Q. And specifically a transaction that posted on November
21 1st.

22 How much was that purchase for?

23 A. It was a few charges, but the first one is \$61.98.

24 Q. And what company was paid?

25 A. Uber.

1 Q. Take a look at Government Exhibit 85.

2 Mr. Brown, what is the date in the upper right
3 corner of this document?

4 A. October 31st of 2016.

5 Q. And is that the day before the credit card transaction we
6 were just discussing?

7 A. Yes, its.

8 MR. BROWN: Your Honor, respectfully, we just want
9 this guy to read the exhibits that are in evidence. He's
10 not -- he's never seen these documents before. I understand
11 they are in evidence, but all he seems to be doing is reciting
12 what's in the documents that are admitted into evidence.

13 THE COURT: I'm not going to get in the way of the
14 government's ability to present its case in the context that
15 it wants to. These items have been stipulated to.

16 So if the government wants the witness to testify as
17 to whether or not he did authorize these transactions, they
18 are entitled to do so.

19 MR. BROWN: Thank you, Your Honor.

20 BY MR. FIORILLO:

21 Q. Sir, what does the first full line of text beneath the
22 date say?

23 A. It says "Thanks for choosing Uber, Kwashie Zilevu."

24 Q. Do you see where it says "trip fare"?

25 A. I do.

1 Q. How much did this trip cost?

2 A. \$61.98.

3 Q. Is that the same amount that was listed on the credit
4 card opened in your name?

5 A. Yes.

6 Q. Underneath the dollar amount, do you see where it says
7 "charged," where the four numbers are listed?

8 A. I do.

9 Q. Are those the same last four numbers as the American
10 Express credit card account opened in your name?

11 A. They are.

12 Q. Underneath that, do you see a designation address listed?

13 A. I do.

14 Q. Is that the same street name as the address listed on the
15 American Express credit card account opened in your name?

16 A. Street name, yes.

17 Q. Would you please look at Government Exhibit 84 now.

18 What does the first sentence below the date say?

19 A. "Thanks for choosing Uber, Kwashie Zilevu."

20 Q. How much did this trip cost?

21 A. \$28.62.

22 Q. How was it paid for?

23 A. American Express ending in 2003.

24 Q. Is that the account that was opened in your name?

25 A. That is.

1 Q. And what is the pickup address listed?

2 A. 14520 General Washington Drive, Woodbridge, Virginia.

3 Q. Is that the exact same address that was listed on the
4 American Express credit card opened in your name?

5 A. That is.

6 Q. Can we take a look at Government Exhibit 83 now, please.

7 What is the first sentence below?

8 A. "Thanks for choosing Uber, Kwashie Zilevu."

9 Q. How much did this Uber trip cost?

10 A. \$36.04.

11 Q. How was it paid for?

12 A. American Express ending in 2003.

13 Q. And what is the destination address listed?

14 A. 14520 General Washington Drive, Woodbridge, Virginia.

15 Q. Again, is that the exact same address listed on the
16 American Express credit card opened in your name?

17 A. That is.

18 Q. Turning to Exhibit 82, now, please.

19 What is the first -- sorry. I'll give you a second
20 to get there.

21 A. Yeah.

22 Q. What does the first sentence below the date say?

23 A. "Thanks for choosing Uber, Kwashie Zilevu."

24 Q. How much did this Uber trip cost?

25 A. \$62.75.

1 Q. How was it paid for?

2 A. American Express ending in 2003.

3 Q. And what is the destination address listed?

4 A. 14516 General Washington Drive, Woodbridge, Virginia.

5 Q. Is that the same street that's named on the American
6 Express credit card account ending 2003?

7 A. Street, yes.

8 Q. Government's Exhibit 81, now, please.

9 What's the first sentence?

10 A. "Thank you for using Uber, Kwashie Zilevu."

11 Q. How much did this Uber trip cost?

12 A. \$59.04.

13 Q. How was it paid for?

14 A. American Express ending in 2003.

15 Q. And what is that destination address listed?

16 A. 14520 General Washington Drive, Woodbridge, Virginia.

17 Q. Is that the exact same address that's listed on your
18 American Express credit card opened in your name?

19 A. That is.

20 Q. Okay. Government's Exhibit 80, please.

21 MR. BROWN: I'm just going to renew my objection.
22 The documents speak for itself. They're in evidence. I
23 understand how the Court ruled.

24 THE COURT: Overruled.

25 MR. FIORILLO: Your Honor, as there are numerous of

1 these exhibits, we'll move ahead out of respect for the
2 Court's time.

3 THE COURT: Yes, sir.

4 BY MR. FIORILLO:

5 Q. Let's turn back to Government Exhibit 11F now. And, if
6 you could, please turn to page 5.

7 A. All right.

8 Q. Do you see the first purchase listed on November 13,
9 2016, for \$261.10?

10 A. I do.

11 Q. Mr. Brown, did you purchase a plane ticket for Kwashie
12 Zilevu to fly from Washington, D.C., to Dallas, Texas, on
13 November 13th?

14 A. No, I did not.

15 Q. Did you authorize anyone to make this purchase with a
16 credit card in your name?

17 A. No.

18 Q. A couple rows below the plane ticket purchase, do you see
19 another transaction listed for November 13, 2016, this time
20 for \$550?

21 A. I do.

22 Q. And who is listed as the recipient of that payment?

23 A. PayPal, MacroTele.

24 Q. Did you ever make a \$550 payment to MacroTele?

25 A. No.

1 Q. Did you ever authorize anyone to do so?

2 A. No.

3 Q. Do you see the last purchase listed for November 13th of
4 2016 for \$201?

5 A. I do.

6 Q. Who is listed as the company being paid there?

7 A. Hoteltonight.com.

8 Q. Could you turn to Government Exhibit 90, please.

9 A. Nine?

10 Q. Ninety, 9-0.

11 A. I'm sorry. Okay.

12 Q. Would you read the bolded line of text at the top of this
13 document.

14 A. It reads: "HotelTonight booking receipt November 13th at
15 Trump International Resort."

16 Q. And the front line, what does it say?

17 A. HotelTonight. Help at HotelTonight.com."

18 Q. And who is this e-mail addressed to?

19 A. Kzilevu@gmail.com.

20 Q. Did you ever receive this e-mail?

21 A. No.

22 Q. Is kzilevu@gmail.com an e-mail address you have ever
23 used?

24 A. No.

25 Q. Do you see the section beginning with "booking

1 confirmation"?

2 A. I do.

3 Q. Read the next few lines after that.

4 Where is this hotel booking confirmation for?

5 A. It looks like Trump International Resort in Sunny Isles,
6 Florida.

7 Q. Now, further down on the page, do you see where it says
8 "receipt details"?

9 A. I do.

10 Q. Who is the guest for this hotel confirmation?

11 A. Kwashie Zilevu.

12 Q. Beneath that, in the last line of text in that paragraph,
13 do you see where it says "We charged \$201 to the American
14 Express credit card ending 2003, under the name
15 HotelTonight.com"?

16 A. I do.

17 Q. Is that the same last four digits of the credit card
18 account opened in your name that we've been discussing today?

19 A. Yes.

20 Q. Could you turn to Government Exhibit 11H, now, please.

21 Looking at the first page, again, in the bottom
22 left-hand corner, who is the statement addressed to?

23 A. Matthew B. Brown, Bellview Auto.

24 Q. What is the address listed?

25 A. 14520 General Washington, Woodbridge, Virginia.

1 Q. Is that the same as it has been with other statements we
2 have reviewed today?

3 A. Yes.

4 Q. Can you now look at the account number in the upper right
5 corner of the page.

6 A. Hmm-mm.

7 Q. What is it?

8 A. It ends in 3001.

9 Q. Has that changed from the other month's statements?

10 A. Yes.

11 Q. Sir, do you see where it says previous balance?

12 A. I do.

13 Q. How much is listed?

14 A. \$42,939.24.

15 Q. Let's take a look at the prior month's statement.

16 Government Exhibit 11G, now, please.

17 At the top left of the page, do you see where it
18 says "new balance"?

19 A. I do.

20 Q. Is that the same amount that's included as the previous
21 balance on the statement that we just looked at, where that
22 account number changed to 3001?

23 A. Yes, it is.

24 Q. Could you turn back to Government Exhibit 11H now,
25 please. Specifically, page 4.

1 A. Okay.

2 Q. Do you see the first transaction on January 7th of 2017?

3 A. I do.

4 Q. Where was that purchase made?

5 A. DSW.

6 Q. Where is that store located?

7 A. Woodbridge, Virginia.

8 Q. Did you make that purchase?

9 A. No.

10 Q. Do you know who did?

11 A. No.

12 Q. Let's look at Government Exhibit 22, please.

13 What does the date stamp at the bottom of the page
14 say?

15 A. January 7th of 2017.

16 Q. Is that the same date as the DSW purchase we were just
17 discussing?

18 A. Yes.

19 Q. Is that you?

20 A. No.

21 Q. Do you know who that is?

22 A. No.

23 Q. Did you ever authorize anyone to use a credit card in
24 your name to make this purchase?

25 A. No, I did not.

1 Q. Could you please turn back to Government Exhibit 11H.

2 Do you see the second transaction on January 8th of
3 2017.

4 A. Which page?

5 Q. Oh, I'm sorry. Fourth page, I believe. The second
6 transaction on January 8th.

7 A. Yes.

8 Q. Where was that purchase made?

9 A. BJ's Wholesale.

10 Q. For how much?

11 A. \$405.67.

12 Q. And where is that BJ's Wholesale located?

13 A. In Woodbridge, Virginia.

14 Q. Please now go to Government Exhibit 24.

15 Do you see the date listed in the top left of this
16 document?

17 A. One second. Yes.

18 Q. What's the date?

19 A. January 8th of 2017.

20 Q. Is that the same date as the BJ's purchase reflected on
21 that credit card account opened in your name?

22 A. Yes.

23 Q. Does this document also list the location of where this
24 purchase was made?

25 A. It does.

1 Q. What is it?

2 A. The whole address?

3 Q. The city would be fine.

4 A. Woodbridge, Virginia.

5 Q. Is that the same as on the credit card statement?

6 A. Yes, it is.

7 Q. What's the dollar amount?

8 A. \$405.67 is the total.

9 Q. And about halfway down the page, do you see where it
10 lists items purchased?

11 Do you see body pillow listed?

12 A. I do.

13 Q. I'd like to take a look now at Government Exhibit 24A.

14 Is that you?

15 A. No.

16 Q. Do you know who that is?

17 A. No.

18 Q. What's the item sitting on the top of the shopping cart?

19 A. It appear to be a body pillow.

20 Q. Now, return to Government Exhibit 11H, please.

21 I'd like you to look at the second transaction
22 listed on January 9th of 2017, on page 4.

23 A. Okay.

24 Q. How much was that transaction?

25 A. \$526.93.

1 Q. Who was paid?

2 A. Floor & Décor.

3 Q. And what city did that transaction occur?

4 A. Woodbridge, Virginia.

5 Q. Can we now look at Government Exhibit 20.

6 Are you there, sir?

7 A. Yes.

8 Q. What is the name of the store listed at the top of this
9 document?

10 A. Floor & Décor.

11 Q. Where is it located?

12 A. Woodbridge, Virginia.

13 Q. What's is the date listed?

14 A. January 9th of 2017.

15 Q. And if you could look all the way to the bottom of the
16 page, what is the grand total listed?

17 A. \$526.93.

18 Q. To the left of that, do you see a payment method listed?

19 A. Yes. It reads "American Express ending in 2003."

20 Q. Is that the same last four numbers as the account opened
21 in your name?

22 A. Yes.

23 Q. Take a look at Government Exhibit 21, please.

24 What is the name of the store that's at the top of
25 this document?

1 A. Floor & Décor.

2 Q. Where is it located?

3 A. Woodbridge, Virginia.

4 Q. And what is the date listed?

5 A. January 16th of 2017.

6 Q. And if you could look down towards the bottom of the
7 page, what is the grand total listed?

8 A. \$262.66.

9 Q. And to the left of that, do you see a payment method
10 listed?

11 A. I do.

12 Q. Is that the same last four numbers as the account opened
13 in your name?

14 A. It is.

15 Q. And please look back up at the top of the page for a
16 moment.

17 Do you see a time associated with this transaction?

18 A. 1:58 p.m.

19 Q. Could you look at Government Exhibit 21A, now, please.

20 Looking at the bottom of the page, do you see a time
21 stamp?

22 A. I do.

23 Q. What time does was this captured?

24 A. It's military time. 2:01.

25 Q. Is that about three minutes after the time listed on the

1 receipt we just looked at?

2 A. It would be.

3 Q. What was the date this was taken?

4 A. It looks like the 1st -- I'm sorry, the 16th of January
5 2017.

6 Q. Is that also the same as on the credit card statement?

7 A. Yes.

8 Q. Is this you in the photo?

9 A. No.

10 Q. Did you authorize this person to use a credit card opened
11 in your name?

12 A. No.

13 Q. Could you now take a look at Government Exhibit 11E.

14 And just to verify again, sir, can you look at the
15 account number on the top right of the page and tell us
16 whether this is another statement from the same account you've
17 identified as being opened in your name.

18 A. It is.

19 Q. Please turn to page 3 now.

20 A. Okay.

21 Q. Do you see the first transaction listed for October 8th?

22 A. I do.

23 Q. Who is the payee listed in that transaction?

24 A. Travelocity.com.

25 Q. How much was Travelocity.com paid?

1 A. \$525.08.

2 Q. Do you see a name listed in the transaction details as
3 well?

4 A. I do.

5 Q. What is it?

6 A. Kwashie Zilevu.

7 Q. And beneath the name Kwashie Zilevu, do you see any
8 additional details about this transaction?

9 A. It reads: "Fontainebleau Miami Beach."

10 Q. Mr. Brown, did you stay at the Fontainebleau in Miami
11 Beach on October 8th of 2016?

12 A. No.

13 Q. Did you purchase a hotel room for someone named Kwashie
14 Zilevu to stay at the Fontainebleau that day?

15 A. No.

16 Q. Did you authorize him to make that purchase?

17 A. No.

18 Q. Can we turn to Government's Exhibit 11H, please, and
19 specifically page 5. Okay.

20 About halfway down the page, do you see a
21 transaction on January 13th of 2017?

22 A. I do.

23 Q. Who is it for?

24 A. An airline ticket, South African Airways.

25 Q. How much was this plane ticket purchased for?

1 A. \$955.56.

2 Q. Looking at the statement, can you tell us what airline is
3 listed on the -- excuse me, you mentioned that already.

4 Below that, do you see a "from" and "to" location
5 listed?

6 A. From Washington Dulles to Accra.

7 Q. Does this transaction information also include a
8 passenger name?

9 A. It does.

10 Q. What is it?

11 A. Eva A-h-i-a-b-l-e.

12 Q. And have you ever purchased a plane ticket for Eva
13 Ahiable to travel from Dulles to Accra?

14 A. No.

15 Q. Did you ever authorize anyone to make this purchase using
16 a credit card opened in your name?

17 A. No.

18 Q. Can you now look at Government Exhibit 52.

19 Is this another e-mail sent to kzilevu@gmail.com?

20 A. Yes.

21 Q. From looking at the "from" line, who sent this e-mail?

22 A. South African Airways.

23 Q. What does the e-mail describe?

24 A. It's an itinerary, electronic ticket, passenger itinerary
25 receipt.

1 Q. Can you now return to Government Exhibit 11H one last
2 time. It's specifically page 5, please.

3 I'd like to direct your attention to the next
4 purchase beneath the plane ticket we discussed. It's also on
5 January 13th of 2017.

6 Who is the payee listed there?

7 A. ProPay Salamone Interiors.

8 Q. How much was paid to Salamone Interiors?

9 A. \$1,364.75.

10 Q. Do you see the e-mail address listed in transaction
11 detail as well?

12 A. I do.

13 Q. What is it?

14 A. Jsalamone@salamonedesign.

15 Q. On January 13th of 2017, did you pay Salamone Interiors
16 \$1,364.75?

17 A. No.

18 Q. Did you authorize anyone to make this -- to pay this
19 company using your credit card in your name?

20 A. No.

21 Q. Mr. Brown, did you have anything to do with this credit
22 card account being used?

23 A. No.

24 Q. When was the first time you ever learned of its
25 existence?

1 MR. BROWN: Objection, asked and answered.

2 THE COURT: Overruled.

3 BY MR. FIORILLO:

4 Q. You may answer.

5 A. January of 2017.

6 Q. And had you known this credit card account had been
7 opened, would you have authorized anyone to use it?

8 A. No.

9 Q. In addition to the specific transactions that we've
10 walked through today with you, were you previously given an
11 opportunity to review all the purchases that were made using
12 this American Express account opened in your name?

13 A. I was.

14 Q. Did you make any of the purchases associated with this
15 account?

16 A. No.

17 Q. Did you authorize anyone to make these purchases?

18 A. Absolutely not.

19 MR. FIORILLO: Nothing further, Your Honor.

20 THE COURT: Cross-examination.

21 MR. BROWN: Thank you, Your Honor.

22 CROSS-EXAMINATION

23 BY MR. BROWN:

24 Q. Mr. Brown, good afternoon.

25 A. Hello.

1 Q. I take it that we are not related. My name is
2 Christopher Brown.

3 A. No, I don't think so.

4 Q. How long have you been in the car dealership business?

5 A. Well, I'm third generation. So our family has been in
6 the business since '61.

7 Q. So am I, in my business.

8 You were asked about Belview Auto.

9 You don't have any knowledge of or information about
10 a company called Bellview Auto?

11 A. No.

12 Q. And your company, you have employees in your company, do
13 you not?

14 A. Right.

15 Q. And do you have a corporate credit card?

16 A. No.

17 Q. Your company doesn't have that?

18 A. No.

19 Q. And do you ever take Uber?

20 A. Do I ever what?

21 Q. Take Uber?

22 A. Sure.

23 Q. Do you have an Uber account?

24 A. I do.

25 Q. What is the name on your Uber account?

1 A. I don't have my phone, so I can't --

2 Q. I mean, do you remember what you do to give it a name?

3 Do you recall, were you allowed to pick any name you
4 wanted?

5 A. I can't remember. It's been a long time since I opened
6 the account.

7 Q. Well, when was the last time you used the account?

8 A. I used it last night.

9 Q. So you get these little map things that have been in the
10 exhibits that said "Thank you for using Uber."

11 Did you get those?

12 A. I received an e-mail that wants you to rate them on their
13 star and tip them.

14 Q. And they kept asking you at the top, "What is the first
15 line?"

16 It says, "Thank you, Kwashie Zilevu, for using
17 Uber."

18 Do you remember seeing that?

19 A. Yeah.

20 Q. Does what you get say that at the top?

21 A. I've seen those before on the e-mail version.

22 Q. And does it say, "Thank you, Matthew Brown"?

23 A. I would assume it does.

24 Q. And is that because you named your account Matthew Brown?

25 A. I assume it would.

1 Q. And if you had named your account something else, it
2 would say whatever that something else was. Thank you to this
3 something else.

4 A. Probably.

5 Q. And Uber never asked you to say, "Why do you want to name
6 your account this," did it?

7 A. Not that I recall.

8 Q. You could have named it Barack Obama, if you wanted to.
9 Would they have stopped you?

10 A. Not sure.

11 Q. Okay.

12 MR. BROWN: That's all I have, Your Honor.

13 THE COURT: Any questions, Counsel?

14 MR. FIORILLO: No redirect, Your Honor.

15 THE COURT: Is this witness subject to recall?

16 MR. FIORILLO: No, Your Honor.

17 THE COURT: All right, sir.

18 Sir, you're free to step down. Apparently, none of
19 the lawyers are going to need you to testify about anything
20 else.

21 There's a rule on witnesses. And the rule on
22 witnesses basically says you cannot discuss the case or any
23 aspect of the case with any other witnesses in the case.

24 All right, sir. Thank you for your testimony.

25 THE WITNESS: Thank you.

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THE COURT: Yes, sir.
(Witness excused.) (Conclusion of Matthew Brown's testimony.)

CERTIFICATE OF REPORTER

I, Tonia Harris, an Official Court Reporter for the Eastern District of Virginia, do hereby certify that I reported by machine shorthand, in my official capacity, the proceedings had and testimony adduced upon the Jury Trial - Excerpt in the case of the **UNITED STATES OF AMERICA versus KHASHIE SENAM ZILEVU**, Criminal Action No.: 1:19-cr-356, in said court on the 12th day of July, 2021.

I further certify that the foregoing 43 pages constitute the official transcript of said proceedings, as taken from my machine shorthand notes, my computer realtime display, together with the backup tape recording of said proceedings to the best of my ability.

In witness whereof, I have hereto subscribed my name, this October 15, 2021.



Tonia M. Harris, RPR
Official Court Reporter